



306788

I. HEADING

Date: July 12, 1996.

Subject: Pollution Report for the OPA Removal Action at the
Nacelle Land Management site, Painesville Twp.,
Lake County, Ohio.

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POLREP NO. 3

II. BACKGROUND:

Site NO:	FPN#096026
BOA Contract No:	DTCG8491A90007
Response Authority:	OPA
State Notification	OEPA
Start Date:	06/28/95
Completion Date:	

III. SITE INFORMATION:

A. Incident Category
OPA Incident Category: Waste Oil/Brine Facility

B. Site Description

1. Site Location: The Nacelle Land Management Corporation

(NLMC) site is located at 675 Lakeshore Boulevard, Painesville Township, Lake County, Ohio. Nacelle maintains a 12-million gallon surface impoundment, brine injection well and storage tanks and containers. Nacelle was incorporated in Ohio in 1979 and accepted oil and brine from oil field producers. The site is located in a rural area and is situated on two adjacent parcels of land in close proximity to the Mentor Marsh.

Previous investigations by state and local officials have documented oil releases from the surface impoundment to the unnamed tributary to Mentor Marsh and to Mentor Marsh itself. The U.S. Fish and Wildlife Service has documented up to 60 Canada geese killed due to oil from the surface impoundment at the facility. As of June 1996, U.S. EPA estimated that the surface impoundment contained 200,000 gallons of surface oil; 10,000,000 gallons of brine and water; and 2,840,000 gallons of oil sludge. The most recent spill event from the surface impoundment occurred on June 18 and 26, 1996, resulting in the release of an estimated 50,000 gallons of oil and brine to the unnamed tributary and Mentor Marsh.

The facility also has 8 aboveground oil storage tanks with a total capacity of 148,000 gallons. This includes 4 former propane storage tanks (each with a 30,000 gallon capacity), two deteriorated road tankers and one aboveground storage tank adjacent to the surface impoundment. In June 1996, a total of 35,000 gallons of oil from the impoundment was stored in the aboveground storage tanks. The facility does not have a written Spill Prevention Control and Countermeasures Plan (SPCC) for these tanks as required under 40 C.F.R Part 112 and as documented by a U.S.EPA inspection conducted on June 19, 1996.

2. Description of Threat: The 12 million gallon impoundment was documented by the Ohio Environmental Protection Agency (OEPA) on June 10, 1996, to have 2 inches of free board at the surface. Heavy rains during the last weeks continue to reduce the free board and contribute to the threat of a release into the unnamed tributary and the Mentor Marsh. On June 18 and 26, 1996 OSC Renninger and Painesville Township Fire Department (PTFD) observed

releases from the impoundment into the unnamed tributary to the Mentor Marsh from a notch that was cut into the side of the impoundment.

C. Preliminary Assessment/Site Inspection Results/Spills

On November 18, 1995, OEPA responded to a release of oil and brine from the surface impoundment at the Facility. The OEPA OSC discovered approximately 8,000 gallons of oil and brine were released into the unnamed tributary to Mentor Marsh. The USCG investigated the incident.

On May 24, 1996, U.S. EPA notified Joseph Berick, Nacelle and Lake Underground of their liability for cleanup of the oil at the facility and requesting notification of a voluntary cleanup. Nacelle did not initiate the cleanup activities requested by the U.S. EPA.

On June 17, 1996, U.S. EPA issued Nacelle Corp. and Joseph Berick (President) an Administrative Order to initiate an oil removal action at the oil impoundment due to continuing threat of release to Mentor Marsh. Nacelle did not initiate a removal action within the three day deadline and denied site access to U.S. EPA to initiate response actions.

June 18, 1996, PTFD observed and documented the surface impoundment discharging oil and brine to the unnamed tributary to Mentor Marsh following a heavy rain. An estimated 50,000 gallons overflowed from the oil surface impoundment. PTFD also documented 3 oil contaminated geese adjacent to the oil impoundment.

On June 19, 1996, an SPCC inspection of the Nacelle Land Management facility was conducted by the U.S. EPA. U.S. EPA documented that the facility did not have a written SPCC Plan for the Nacelle facility. The June 18, 1996, oil spill was not reported to the National Response Center (NRC). The 12 million gallon oil/brine impoundment was observed to be at capacity with visible oil on an unnamed tributary to Mentor Marsh.

IV RESPONSE INFORMATION:

A. Situation

1. Current Situation: Following assistance from the DOJ, Nacelle agreed on June 27, 1996, to U.S. EPA access for 30 days. OPA removal Action initiated on June 28, 1996 to stabilize and complete off-site disposal/recycling of oil and oil saturated soils at the site. June 28 - July 8, 1996: Surface impoundment oil contained with boom at north berm and recovery operations initiated with three vacuum units. A total of 89,200 gallons of oil and 45 cubic yards of oil-contaminated soils transported off-site for disposal. OSC Renninger, START, and Samsel Services currently on site.

2. Removal Activities to Date:

July 9, 1996 - Continued oil recovery operations from surface impoundment. Two tanker loads, estimated 9,600 gallons of oil, transported offsite for disposal at Research Oil in Cleveland, Ohio. One rolloff box, estimated 15 cubic yards, of oil-contaminated soil and sludges transported offsite to be landfilled at American Landfill in Waynesburg, Ohio. OSC contacts USCG to raise total project ceiling from \$200,000 to \$400,000.

July 10, 1996 - Continued oil recovery operations from surface impoundment, operations hampered by thick oil sludge layer floating on the brine, which hinders pumping and transfer operations. Three tanker loads, estimated 15,200 gallons of oil, transported offsite for disposal at Research Oil in Cleveland, Ohio. One oil sludge and two oil samples collected and submitted for laboratory analysis. Removed culvert and associated oil-contaminated soils from below fire hydrant/notch discharge area.

July 11, 1996 - Continued oil recovery operations. Two tanker loads, estimated total of 9,950 gallons of oil, transported offsite for disposal at Research Oil in Cleveland, Ohio. Four rolloff boxes, estimated total of 60 cubic yards, of oil-contaminated soil and sludges transported offsite to be landfilled at American Landfill in Waynesburg, Ohio. Prepared oil sludge transfer and storage areas onsite. Replaced culvert pipe with new culvert.

July 12, 1996 - Oil recovery operations on the surface impoundment continued. One tanker load, estimated 4,600 gallons of oil, transported offsite for disposal at Research Oil in Cleveland, Ohio. A total of 124,050 gallons of oil recovered and transported offsite for disposal to date. One tanker load, estimated 4,000 gallons, oil sludge transported offsite for solidification and landfill at American Landfill in Waynesburg, Ohio. Four additional rolloff boxes mobilized to site for use as temporary oil sludge storage capacity and for transportation and disposal of oil-contaminated soils.

3. Enforcement:

DOJ prepared to file a temporary restraining order against Nacelle to provide U.S. EPA site access.

B. Next Steps

- Complete oil and sludge recovery from surface of oil impoundment.
- Complete offsite disposal of oil, oil sludge, and oil-contaminated soil on a daily basis.

C. Key Issues

- Prevent any further entrapment of migratory waterfowl during oil recovery.
- Continued threat of brine overflow from surface impoundment, due to PRPs inability to remove brine from impoundment.

V. COST INFORMATION

Estimate Through July 10, 1996

	Budget	Cost to Date	Remaining
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Samsel	\$350,000	\$177,270.34	\$172,729.66
START	\$ 40,000	\$19,539.45	\$20,460.55
EPA Direct	\$ 10,000	\$ 4,099.00	\$ 5,901.00
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Total	\$400,000	\$200,908.79	\$199,091.21